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February 12, 2002

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

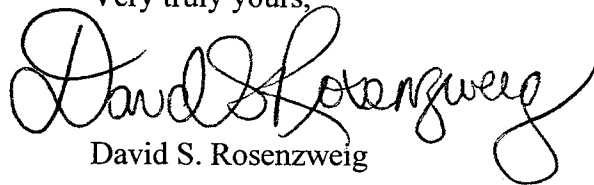
Re: Franklin W. Olin College of Engineering, D.T.E. 01-95

Dear Ms. Cottrell:

I have enclosed an original and nine (9) copies of the fourth set of information requests of Boston Edison Company to Wellesley Municipal Light Plant in the above-referenced proceeding.

I have also enclosed a Certificate of Service. Thank you for your attention to this matter.

Very truly yours,



David S. Rosenzweig

Enclosures

cc: Robert Hayden, Hearing Officer  
Paul Afonso, General Counsel  
Ronald LeComte, Director, Electric Power Division  
William Stowe, Esq.  
Eric Krathwohl, Esq.  
Kenneth Barna, Esq.

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**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Franklin W. Olin College of Engineering  
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D.T.E. 01-95

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon the Department of Telecommunications and Energy, and counsel for all parties, by hand or first class mail, in accordance with the requirements of 220 C.M.R. 1.05 (the Department's rules of Practice and Procedure).



David S. Rosenzweig, Esq.  
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21 Custom House Street  
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(617) 951-1400

Dated: February 12, 2002

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Franklin W. Olin College of Engineering

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D.T.E. 01-95

**BOSTON EDISON COMPANY'S, d/b/a NSTAR ELECTRIC,  
FOURTH SET OF INFORMATION REQUESTS TO  
WELLESLEY MUNICIPAL LIGHT PLANT**

Below are Boston Edison Company's, d/b/a NSTAR Electric ("Boston Edison"), fourth set of information requests in this proceeding. For purposes of these information requests, please refer to the instructions provided with the second set of information requests that Boston Edison propounded.

- BE-4-1      With reference to the response to Information Request BE-2-12, please provide a copy of all bills or invoices for electricity service sent by Wellesley Municipal Light Plant ("WMLP") to Babson College ("Babson") since January 1, 1998, including but not limited to any bills or invoices for electricity service that would incorporate electric service to Franklin W. Olin College of Engineering ("Olin"). (Note: Boston Edison would agree to be provided a copy of all such bills pursuant to the terms of a reasonable non-disclosure agreement.)
- BE-4-2      With regard to the response to Information Request BE-2-19 in which WMLP indicated that the electricity supplied by Babson to Olin "is neither metered nor resold to Olin College," please describe the basis for WMLP's statement that the electricity supplied by Babson to Olin is neither metered nor resold. Please provide all related documentation in support of that belief. Please provide the name(s) of people contacted at Babson and Olin who confirmed that statement. Also, please define the term "resold" as it appears in the response to Information Request BE-2-19. Please indicate whether, in Mr. Joyce's view, metering equipment is necessary in order for electricity to be "sold" or "resold."
- BE-4-3      With regard to the response to Information Request BE-2-1, Exhibit 1, please define the term "resold" in WMLP's "Large General Service – Primary" tariff.
- BE-4-4      With regard to the response to Information Request BE-2-29, please identify any and all electricity customers that WMLP believes are located in Needham that are served by WMLP, where NSTAR Electric has not consented to such service by WMLP. Please provide all related documentation that forms the basis for WMLP's belief.

- BE-4-5      Please provide the basis for the statement contained in the June 21, 1999 letter to Lawrence Milas, President of the F.W. Olin Foundation, from Richard Joyce, Director of the WMLP which, with respect to WMLP providing electric service to Olin, reads: "The WMLP provides service based on a previous order issued by the DTE's predecessor, the Massachusetts Department of Public Utilities." See Information Request Attachment BE-1-8A. Please provide the docket number(s) and a copy of the referenced decision(s).
- BE-4-6      Please provide the basis for the statement contained in the September 9, 1999 letter to James O'Grady, Project Manager for Hanscombe Associated, Inc., from Richard Joyce, Director of the WMLP which reads: "Given the past territorial decisions of the Department of Telecommunications and Energy, the WMLP may not be able to provide electric service to the Olin Campus unless the supply is connected directly through Babson College." See Information Request Attachment BE-1-8A. Please provide the docket number(s) and a copy of the referenced decision(s). In particular, please explain in full the basis for Mr. Joyce's statement that those Department decisions: (i) prohibit WMLP from providing electric service directly to Olin; and (ii) authorize WMLP to provide service to Olin if WMLP's service is through Babson.
- BE-4-7      Please identify the electrical loads of Babson (in both energy and demand), on a monthly basis, from January 1, 1998 through January 31, 2002. Please identify the source for all data.
- BE-4-8      Please provide the basis for the statement in the September 9, 1999 letter to James O'Grady, Project Manager for Hanscombe Associated, Inc., from Richard Joyce, Director of the WMLP, that WMLP expected to freeze its rates for 32 months with an expected 20 percent reduction in rates after May 31, 2002. See Information Request Attachment BE-1-8A. Please indicate whether that rate freeze has occurred and what WMLP's current plans are with respect to a 20 percent rate decrease effective after May 31, 2002.
- BE-4-9      Please provide a copy of the August 27, 2001 letter from Don Newell of WMLP to Stephen Hannabury of Olin that stated "WMLP's ability to provide temporary electric service to the Olin Campus is contingent upon Olin College receiving approval from the Department of Telecommunications and Energy." This letter was referenced in a September 17, 2001 email from Gary Babin of WMLP. See Attachment BE-1-8A.

BE-4-10 With reference to the response to Information Request BE-1-32, please provide a map of all of Babson's property in Wellesley and Needham, specifically identifying: (i) all buildings, facilities, houses, and dormitories; and (ii) for each of the buildings, facilities, houses, and dormitories, whether the property is served by WMLP or Boston Edison. Please also indicate when service to Babson was commenced at each of these locations (and by whom).

BE-4-11 Please describe in detail WMLP's understanding of how temporary electric service is being provided to the Olin campus. Please include in your response:

- (a) WMLP's understanding of when such service began;
- (b) Who is delivering the electricity to Olin;
- (c) Who is billing Olin for such electricity;
- (d) The role of Babson in the provision of temporary electric service to Olin;
- (e) Whether Babson's role in the provision of temporary electric service to Olin:
  - (i) includes the delivery of electricity which operates at a voltage level typically equal to or greater than 110 volts and less than 69,000 volts;
  - (ii) incorporates plant or equipment used for the distribution of electricity and which is not a transmission facility, cogeneration facility, or small power production facility;
  - (iii) represents a company engaging in the distribution of electricity or owning, operating or controlling distribution facilities; and
  - (iv) constitutes a sale of electricity and related services to a retail customer.
- (f) To the extent that WMLP's answer to any of parts (e)(i), (e)(ii), (e)(iii) or (e)(iv) above are yes, please state whether WMLP has provided Babson authorization to provide such service and/or act in that capacity; and
- (g) The amount of electricity (in energy and demand) consumed by Olin for each month such temporary electric service has been in place.

Please explain the basis for WMLP's understanding on each subpart individually and provide the source(s) for all information.

Dated: February 12, 2002